

# EXHIBIT A

(P7)

Harris County District Clerk  
(1983 Lawsuit Form)  
Civil Action No.

#

2023 88395

152nd

Roosevelt L. Linicomn Jr

{Vs}

Harris County Sheriff's Office  
( "Et al" )

Roosevelt L. Linicomn Jr  
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Harris County Sheriff Office  
Harris County District Attorney Office  
"et al"  
("see attached")

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

**FILED**

Marilyn Burgess  
District Clerk

DEC 27 2023

Time: \_\_\_\_\_  
Harris County, Texas  
By \_\_\_\_\_  
Deputy

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**  
(Non-Prisoner Complaint)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging

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The Defendants:

Court # 176<sup>th</sup> - "Steven Belt" District Attorney  
in Official Capacity

Court # 482<sup>nd</sup> - "Michelle Anderson" District Attorney  
in Official Capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Address

Roosevelt (L) Lincoln Jr.  
3401 Fannin St  
Houston TX 77004  
City State Zip Code

County  
Telephone Number  
E-Mail Address

Harris  
(713) 256-6878  
Mike Lincoln @ gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name  
Job or Title (if known)  
Address

E. CRAIG - [Unit 41F35]  
Sheriff - (Harris County)  
6831 Cypresswood Dr.  
Spring TX 77379  
City State Zip Code

County  
Telephone Number  
E-Mail Address (if known)

Harris  
- unknown  
- unknown

☐ Individual capacity ☒ Official capacity

**Defendant No. 2**

Name  
Job or Title (if known)  
Address

B. EVANS [badge #528550]  
Sheriff - (Harris County)  
6831 Cypresswood Dr.  
Spring TX 77379  
City State Zip Code

County  
Telephone Number  
E-Mail Address (if known)

Harris  
- unknown  
- unknown

☐ Individual capacity ☒ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

E. Wilrich [badge# 526983]  
 Sheriff - (Harris County)  
 1200 Baker St.  
 Houston TX 77002  
 City State Zip Code  
 Harris  
 - unknown  
 - unknown

☐ Individual capacity ☒ Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Husley, A.C. [badge# 27083]  
 Sheriff - (Harris County)  
 1200 Baker St.  
 Houston TX 77002  
 City State Zip Code

☐ Individual capacity ☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)  
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup> Amendment Violations

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- August 16th 2020, I was arrested for a Robbery Bodily Injury. 59 year old Michell Macon made a false police report, and police failed to investigate; but signed off on a Affidavit stating that I punched the 59 year old white woman "twice in the left eye", this led to an arrest warrant without evidence. (There were 5 regular pictures) with out medical history, injuries , or witnesses. Two D.A's preceeded in malicious prosecution for 2 years. Case# 168420301010 was Dismissed on : August 19, 2022 (No Witnesses)

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
- Harris County Sheriff Office on Cypresswood - December 19<sup>th</sup> 2019 - (the police report)
  - (then elevated to)
  - Harris County District Attorney / Court 176th and then Court 482nd - July 30<sup>th</sup> 2020
- B. What date and approximate time did the events giving rise to your claim(s) occur?
- A Warrant was made without Probable Cause on - July 30th 2020 / Arrest date: August 16th 2020
  - Malicious Prosecution started: August 19th 2020 - August 19th 2022
  - ~~Malicious Prosecution is the ongoing Criminal Proceedings against Someone without Reasonable grounds.~~
- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
- The Harris County Sheriffs Office, Police Department , made a False Police Report more then what it was; I was not even contacted for questions. This Violated the 4th,5th,8th, and 14th Amendments of the United States Constitution;
- Case#168420301010 was presented without evidence, witnesses, medical procedures, camera footage, or anything that will explain the Warrant.
- The Police was not trained to know better then to believe anything "without first doing an investigation". They Believed anything; and Violated my Rights with that unlogical vow.
- No Ambulance Service or any other details was submitted , but only the Affidavit from the Police, along with 5 Regular Pictures ; Harris County District Attorney Office continued Malicious Prosecution for a total of 24 full Months, without Probable Case, and dismissed at Trial date: 8/19/22

#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Only, because the Police stated in an "Sworn Affidavit" that I punched a 59 year old white lady (twice in the left eye), was a warrent was made for my arrest. (Which made me lose my freedom as an Injury).

Even so that no medical emergency service, or other obvious indications that this action happen was submitted with the Affidavit, still my life was taken from me by the actions of these 4 men who signed off on Police Report# 1912-06825, and submitted regular pictures. (This caused me to loose people in my familly ,while incarcerated).

Mental Anguish came from 2 years of Stressfulness, and discomfort; I was assaulted in jail by 4 guys with sticks. I received 10 staples in my head, and an Court appointed Lawer (Patrick J. Ruzzo) who lied and conspired against me through - out the proceedure; in which State Bar has recorded details, and Patrick J. Ruzzos personal emails of this proceedure. (as facts)

As well as (two) District Attorneys who did a full length of malicious prosecution.

All the above things happen to me and did neither the Police or D.A. have Reasonable Grounds to detain me, put me in prison, or, offer me the 5 years offered.

My 4th, 5th, 8th and 14th Constitutional rigfht(s) were Violated, which caused these above injuries;  
And loss of life, priviledges and freedom.

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#### V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Roosevelt L. Linicomn Jr. ask this court today for the total of 3 million dollars for Actual Damages.

This includes:

4th Amendment Violation by the (4)Harris County Sheriff Officers = (\$1.5 million)

Malicious Prosecution by Steven Belt and Michelle Anderson case # 168420301010 = (\$1.5 million)

and For Conspricy by Court Appointed Lawer "Patrick J. Ruzzo" = (\$50,000 Punitive Damages)

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

December - 27<sup>th</sup> - 2023

Signature of Plaintiff

Printed Name of Plaintiff

Roosevelt L. Linicomn Jr.

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address





I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this January 30, 2024

Certified Document Number: 112025095 Total Pages: 7

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**